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Letter of Transmittal

Date: January 29, 1993

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To: Secretary
Federal Communications Commission
Washington, D.C. 20554

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One (1) original and Nine (9) copies of the following document are submitted for the Commission's review.

Comments to FCC NPRM - PR Docket No. 92-289

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FEDERAL COMMUNICATIONS COMMISSION
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Secretary
Federal Communications Commission
Washington, D.C. 20554

January 29, 1993

Subject: Comments to FCC NPRM - PR Docket No. 92-289

Dear Secretary:

These comments are submitted with some reluctance. I wish not to impress upon the Commission that many in the amateur radio community are commencing to act like children. The fact still remains today, that most amateur radio operators are very decent, respectable, and courteous people.

I have no comment on the Novice Enhancement portion of the NPRM, but I do support the provision of a weak signal portion of the 222 MHz band.

It appears, however, that this concept is becoming important on all VHF/UHF amateur allocations. The requirement for an official, long term provision, of weak signal portions on VHF/UHF allocations should be more universally addressed and applied.

Ideally, the amateur community should perform its own band planning. In doing so, it demonstrates a level of maturity within the ranks and reduces the burden on the FCC to make band planning determinations. However, I am deeply sad to say, there are those who prefer to operate directly in opposition to ARRL band plans. Possibly for the sole reason of contempt and defiance. In doing, they set bad and injurious examples for the many newer amateurs entering the VHF/UHF spectrum. This is critical due to the larger influx of new amateurs entering the VHF/UHF region as a result of previous rule makings. Often much in one's life, both good and bad, is learned by example.

Continually, interference by FM operations have been experienced in the weak signal portion (ARRL Band Plan) of the 2m band. The frequency of this problem is beginning to soar. Just one example is the thwarting of a recent attempt to contact stations with very weak and distorted CW signals operating during Aurora propagation on the evening of January 25, 1993. In this case, I fully suspect

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the interference was unintentional, since the FM operators probably could not detect the many 'very weak' Aurora propagated CW signals present. In other unfortunate cases, I suspect interference is actually becoming intentional to prove some sort of obscure point.

Wide band modes just don't mix well with the narrow band modes, especially if spectrum efficiency is to be maximized. In addition, and very importantly, the 'FM only' stations are characteristically not equipped to command the same sensitivity required to properly identify whether the frequency is in use.

If a plea is made for a station to move to the agreed upon FM simplex frequencies (especially when many happen to be open and clear) a confrontational type response is commonly returned. The tone of the response is frequently comparable to; 'Get out of here, those are just band plans, they carry no official weight, the FCC says I can operate FM here, so butt out, I'll go to 144.200, how's that!' Indeed, FM has been heard often on 144.200, the accepted SSB/CW 2m calling frequency.

Interference by FM operation in the weak signal portion of 2m is becoming more commonplace. On several occasions I have copied five (5) or more FM simplex conversations below 144.300 MHz. Sometimes as low as 144.105 MHz. On one such occasion, I found only two (2) recognized FM simplex frequencies in local use.

Regretfully, I strongly urge the commission to consider a rule making to create 'weak signal only' segments on all or most of the common vhf/uhf amateur allocations. While not as serious of a condition on all allocations, if such a rule making were established, it would be best to make a single uniform act. The Total Quality Management approach of; Do it Once and Do it Right the First Time, has merit.

As the years elapse, it is growing more obvious that this will be a significant problem area. Newer amateurs have already been heard making statements that they surmised it was acceptable to operate FM below 144.300 MHz, since while tuning the band they often heard FM simplex conversations there. Other comments similar to; 'I never hear anyone using this portion anyway', are made. If the typical FM station had the necessary antennas and overall sensitivity, then this might not be the case. Additionally, the need for space can swiftly increase and decrease during brief time periods as the various propagation modes, that bestow the VHF/UHF spectrum, come and go.

As more and more individuals become licensed, the amount of stations with unfortunate habits learned from some of their fellow amateurs will increase. Habits and attitudes are arduous to change once they become fully formed. There is already a number of bad

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seeds out there. Lets provide some method of nipping it in the bud before the entire problem sprouts too far.

I see the need to immediately extend any official weak signal segments to at least the 70cm band amateur allocation. In addition to the current weak signal segment being addressed by the said NPRM for the 222 MHz allocation, a similar and severe need is befalling on the 144 MHz allocation.

In closing, the overwhelming task the Commission faces, with the sorting of interests, is certainly understood. However, with the radio spectrum becoming more constrained as the years progress, there appears the need for at least some basic CW/SSB weak signal segment provided for by official Federal Communications Commission regulations on the VHF/UHF amateur allocations. It is certainly hoped that in its wisdom, the Commission can see through to this essential need and make a judgment accordingly.

Sincerely,

A handwritten signature in cursive script that reads "Kevin J. Rogers".

Kevin J. Rogers

cc: ARRL
Emil Pocock